

AO 91 (Rev. 01/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

MSH

United States of America

v.

Robert S.W. TINSLEY

Defendant

Case No.

2:20-mj-201

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 03/13/2020 in the county of Franklin in the Southern District of Ohio, the defendant violated 21 U. S. C. § 846 / 841a, an offense described as follows:

TINSLEY did conspire with others, to possess with the intent to distribute, a Kilogram or more of Heroin, a Schedule I controlled substance; and 500 grams or more of Cocaine, a Schedule II controlled substance, in violation of Title 21 U.S.C. Sections 846 and 841(a).

This criminal complaint is based on these facts:

(See attached)

☒ Continued on the attached sheet.

 #4800
Complainant's signature

Jason Burns, ATF Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/13/2020

City and state: Columbus, Ohio



Judge's signature

Chelsey M. Vascara, U.S. Magistrate Judge

Printed name and title


PROBABLE CAUSE AFFIDAVIT

I, **Jason Burns**, being duly sworn, depose and state that:

I have been a Special Agent of the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives since September 2005. I am a graduate of the Federal Law Enforcement Training Center's Criminal Investigator School and a graduate of the ATF National Academy; and as a result of my training and experience as an ATF Special Agent, I am familiar with Federal criminal laws pertaining to Narcotics and Firearms violations.


1. In July 2018, Special Agent (S/A) Jason Burns initiated an investigation into Robert TINSLEY and others, both known and unknown to investigators, involved in trafficking heroin and crack cocaine. TINSLEY is further described as Male/Black, 6'2", 180 lbs., short black hair, brown eyes, DOB: 4/11/1982, FBI #: 926982MB6. TINSLEY had multiple arrests for Aggravated Robbery, Carrying a Concealed Weapon, Having Weapons Under Disability, Possession of Drugs, Domestic Violence, and Assault. TINSLEY has the following convictions:
 - Attempted Robbery (F-3), Huron County, Ohio, 2000;
 - Assault (M-1), Franklin County, Ohio 2010;
 - Possession of Drugs, Franklin County, Ohio 2011;
 - Possession of Drugs, Franklin County, Ohio 2016.
2. During the course of the investigation, S/A Burns identified the following residences associated with the Robert and Andrea TINSLEY: 4042 Walnut Crossing Dr. Groveport, OH 43125 and 7187 Lithopolis Rd., Groveport, OH 43125.
3. On or about March 6, 2020, S/A Burns applied for and received Federal search warrants for 4042 Walnut Crossing Dr. Groveport, OH 43125 and 7187 Lithopolis Rd., Groveport, OH 43125.
4. On or about March 11, 2020, S/A Burns monitored a fixed surveillance video at 4042 Walnut Crossing Drive, Groveport, OH. On this same date, at approx. 7:32 PM, S/A Burns identified a black Cadillac, bearing Ohio Tag: HZM-6880 (later to be determined to be registered to Andrea TINSLEY) arrive at 4042 Walnut Crossing Drive, and park in the driveway. At approx. 8:53 PM, the Cadillac left the residence. S/A Burns has also observed this vehicle at 7187 Lithopolis Rd, Groveport, OH.
5. On or about March 12, 2020, at approx. 9:44 AM, S/A Burns observed the Cadillac arrive at 4042 Walnut Crossing Drive, and identified Robert TINSLEY exit the vehicle and approach the front door of the residence. At approx. 10:42 AM, TINSLEY exits the residence and leaves in the Cadillac.
6. On this same date, at approx. 3:27 PM, Columbus Police Officers were conducting surveillance at 2500 Harrisburg Pike, Grove City, OH. Officers observed Robert TINSLEY driving a black Cadillac, bearing Ohio Tag: HZM-6880. The officers observed as TINSLEY exited the mobile home park located at 2500 Harrisburg Pike. The officers also observed Shawn FORSYTHE, a known narcotics trafficker and associate of TINSLEY, driving a blue Dodge Ram pickup truck, bearing Ohio Tag: HVA-3467, exiting 2500 Harrisburg Pike, Grove City, Ohio the same time as TINSLEY.

7. On this same date, approx. 3:47 PM, S/A Burns observed the Cadillac arrive at 4042 Walnut Crossing Drive, and identified Robert TINSLEY exit the vehicle and approach the front door of the residence.
8. On or about March 13, 2020, at approx. 3:30 AM, S/A Burns conducted surveillance at 7187 Lithopolis Rd., Groveport, OH. Among the vehicles parked at the residence was the Cadillac.
9. On this same date, at approx. 4:30 AM, ATF Agents conducted Federal search warrants at 7187 Lithopolis Rd. and 4042 Walnut Crossing Dr., Groveport, OH. Agents secured Robert and Andrea TINSLEY, and two (2) children inside 7187 Lithopolis Rd. without incident. Agents and Officers recovered a Glock Pistol and a large amount of U.S. Currency in the Master Bedroom.
10. Agents and Officers secured 4042 Walnut Crossing Drive with no occupants present. Agents and Officers recovered one (1) suspected Kilogram of cocaine, one (1) suspected Kilogram of heroin, and four (4) firearms. S/A Burns field-tested the suspected Kilogram of cocaine, which tested positive for Cocaine, a Schedule II controlled substance, and weighed approx. 1108 grams with the packaging. S/A Burns field-tested the suspected Kilogram of heroin, which tested positive for Heroin, a Schedule I controlled substance, and weighed approx. 1346 grams with the packaging.
11. Based on your affiant's knowledge, training and experience as an ATF Special Agent in dealing with possession of controlled substances, your affiant believes there is probable cause to believe that Robert TINSLEY did conspire with others, to possess with the intent to distribute a Kilogram or more of Heroin, a Schedule I controlled substance; and 500 grams or more of Cocaine, a Schedule II controlled substance, in violation of Title 21 U.S.C. Sections 846 and 841(a).



Jason R. Burns
Special Agent, ATF

Sworn to and subscribed before me this 13 day of March 2020 in Columbus, Ohio.



Chelsey M. Vascura
U.S. Magistrate Judge